

DEC 05 2023

U.S. DISTRICT COURT
W. DISTRICT OF N.C.

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF NORTH CAROLINA
ASHEVILLE DIVISION

DOCKET NO. 1:23-cr-00083-MR-WCM

UNITED STATES OF AMERICA)
)
)
)
)
v.)
)
)
SEAN CHRISTOPHER WILLIAMS)
)
)

BILL OF INDICTMENT

Violations:
18 U.S.C. § 2252A(a)(1)
18 U.S.C. § 2252A(a)(5)(B)

THE GRAND JURY CHARGES:

COUNT ONE

Between on or about April 13, 2021, and April 29, 2023, in Jackson County, within the Western District of North Carolina and elsewhere, the defendant,

SEAN CHRISTOPHER WILLIAMS

did knowingly transport child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Section 2252A(a)(1).

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COUNT TWO

On or about April 29, 2023, in Jackson County, within the Western District of North Carolina, and elsewhere,

SEAN CHRISTOPHER WILLIAMS

knowingly possessed and accessed with intent to view any material that contained an image of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that involved a prepubescent minor and a minor who had not attained 12 years of age, that has been transported using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that have been mailed, and shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Section 2252A(a)(5)(B).

COUNT THREE

On or about April 29, 2023, in Jackson County, within the Western District of North Carolina, and elsewhere,

SEAN CHRISTOPHER WILLIAMS

knowingly possessed and accessed with intent to view any material that contained an image of child pornography, as defined in Title 18, United States Code, Section 2256(8)(C), that involved a prepubescent minor and a minor who had not attained 12 years of age, that has been transported using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that have been mailed, and shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Section 2252A(a)(5)(B).

NOTICE OF FORFEITURE AND FINDING OF PROBABLE CAUSE

Notice is hereby given of 18 U.S.C. § 2253; 18 U.S.C. § 924(d); 18 U.S.C. § 2461(c); and 21 U.S.C. § 853. The following property is subject to forfeiture in accordance with 18 U.S.C. § 2253, 18 U.S.C. § 924(d); 18 U.S.C. § 2461(c); and 21 U.S.C. § 853:

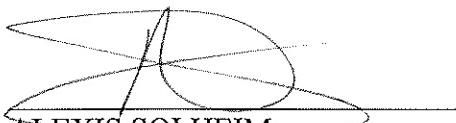
- a. Any visual depiction or book, magazine, periodical, film, videotape, or other matter which contains any such depiction, which was produced, transported, mailed, shipped, or received during the violations set forth in this bill of indictment;
- b. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from proceeds of the violations;
- c. Any property, real or personal, used or intended to be used to commit or promote the violations; and
- d. If, as set forth in 21 U.S.C. § 853(p), any property described in (a), (b), or (c) cannot be located upon the exercise of due diligence, has been transferred or sold to, or deposited with, a third party, has been placed beyond the jurisdiction of the court, has been substantially diminished in value, or has been commingled with other property which cannot be divided without difficulty, all other property of the defendant/s to the extent of the value of the property described in (a), (b) and (c).

The Grand Jury finds probable cause to believe that the following property that was seized on or about April 29, 2023, during the course of the investigation of the offenses herein is subject to forfeiture on one or more of the grounds stated above: one (1) Western Digital My Passport external hard drive; one (1) Western Digital Easystore external hard drive; one (1) Hitachi 750GB hard disk drive; one (1) Seagate 2TB hard disk drive; one (1) Toshiba 750GB hard disk drive; one (1) 2GB USB thumb drive; and four (4) generic unmarked USB thumb drives.

A TRUE BILL:

GRAND JURY FOREPERSON

DENA J. KING
UNITED STATES ATTORNEY



ALEXIS SOLHEIM

ASSISTANT UNITED STATES ATTORNEY